

IN THE UNITED STATES DISTRICT COURT
For The District of DelawareJames Hall,
v. PlaintiffDavid Holman, Lawrence McGuigan,
Clyde D. Agers, DefendantsC.A. No. 4 04-1328
06-1288-GMSJury Trial of twelve
Demanded

BD scanned

Motion for Appointment of Counsel

Respectfully to the Appropriate Rule of Civil procedures and all
Case law authorities.

Come now the plaintiff James E Hall And moves this honorable
court to grant his motion Appointing him counsel for purposes of
Discovery Trial motions and trial the plaintiff Deposes and
States as follows:

- 1) Plaintiff cannot afford counsel
- 2) Plaintiff has mad several attempts to obtain counsel
- 3) Plaintiff has caused several copies of appointment of counsel
to the Honorable court the Honorable court felt that at the
time plaintiff mentioned the court for appointment of counsel

The court felt that his motion was premature

- 4) The Honorable court stated about it shall entertain a renewed motion for appointment of counsel when the time warranted Plaintiff respectfully ask that the time be now
- 5) Plaintiff has made mistakes which were almost fatal to his claim a lawyer at this stage of the litigation would greatly improve the odds and make even the playing field a lawyer would greatly improve Plaintiff motions to the court, Address incoming motions from defendant counsel allow a broad and level Gross Examination of Professional witnesses (I.e. Doctors Lawyer, Supervisor-Officials Ect.)
- 6) In his motion for Summary Judgement the Plaintiff asked this Honorable court to grant him counsel for the limited purpose of settlement talks and trial
- 7) a counsel for the Plaintiff and this firm would greatly improve his chances of presenting evidence to the court and defeating evidence presented by opposition
- 8) matters have improved beyond the initial stages of this litigation The Plaintiff has no experience in pretrial motions settlement talks Deposition Etc a lawyer at this stage his expertise would better suit Brief Answering Timelines.

Conclusion

Plaintiff has brought forth a meritorious legally non-frivolous claim against Defendants and respectfully ask this court to appoint him counsel in the instant case for purposes of Deposition, Discovery matter (Ex; Brief answering) and leveling the playing field in the interest of fairness.

Wherefore, plaintiff prays this honorable court grant his motion appointing him counsel to represent him in the instant case in the interest of fairness and the interest of justice.

Submitted this 3 day of July of


James Hall 00167581
1181 Paddock Rd Smyrna
Del 19977

Certificate of Service

I, Jane Hall, hereby certify that I have served a true and correct cop(ies) of the attached: 2 Appomattox of course
upon the following
parties/person (s):

TO: Deputy Attorney General
Mrs Stacy Karchoula
Department of Justice 820 N.
Frances St 8th floor court office
Bldg. Wilmington DE 19801

TO: _____

TO: _____

TO: _____

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977, postage to be paid by the Dept. Of Corrections.

On this 3 day of July, 2007

Jane Hall